

INCORPORATED

What Better feels like."

INTEGRATIVE THERAPEUTICS INC."

NF Formulas + PhytoPharmica
Tyler Encapsulations + Vitaline Formulas

9755 SW Commerce Circle, Suite B2
Wilsonville, OR 97070
P: 503.582.8386 * F: 503.582.0467

ENZYMATIC THERAPY* & PHYTOPHARMICA*

825 Challenger Drive, Green Bay, WI 54311-8328 P: 920.469.1313 F: 888.570.6460 (Enzymatic) P: 920.469.9099 F: 920.469.4418 (Phyto)

April 26, 2004

Office of Nutritional Products, Labeling & Dietary Supplements, HFS 810 Center for Food Safety and Applied Nutrition Food and Drug Administration 5100 Paint Branch Parkway College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Calcium	Vitamin D (as cholecalciferol): Increases the	Vitamin D (as cholecalciferol)
	absorption of calcium-necessary for healthy bones and teeth.*	

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: FLICIL

Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 4/2/6/04

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

Michael P. Devereux Chief Financial Officer

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April 27, 2004

Office of Nutritional Products, Labeling & Dietary Supplements, HFS 810 Center for Food Safety and Applied Nutrition Food and Drug Administration 5100 Paint Branch Parkway College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

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PRODUCT NAME	<u>STATEMENTS</u>	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Calcium	Supplementation helps keep calcium restored to	Calcium (from tricalcium phosphate
	the bones and maintain the balance of calcium	and calcium citrate)
	between the blood and the bones.*	·

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: FLICHT

Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 4-30-04

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

Michael P. Devereux Chief Financial Officer



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April 28, 2004

Office of Nutritional Products, Labeling & Dietary Supplements, HFS 810 Center for Food Safety and Applied Nutrition Food and Drug Administration 5100 Paint Branch Parkway College Park, MD 20740

RE:

Label Claims/Disclaimers

Dear Sir or Madam:

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PRODUCT NAME		INGREDIENT(S) TO WHICH THE CLAIM REFERS
Calcium	The main work of phosphorus is in the formation of	Phosphorus (from tricalcium
	bones and teeth. It is important in the formation of	phosphate)
•	proteins and cellular growth.*	

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: KIPCILL

Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 4/28/04

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

Michael P. Devereux Chief Financial Officer



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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Calcium	Magnesium is needed for bone formation and making new cells.*	Magnesium (as magnesium oxide and magnesium aspartate)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: ______Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 4/28/04

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

Chief Financial Officer



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April 29, 2004

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Calcium	Calcium contains vitamin D, magnesium, and phosphorus, which are critical for calcium absorption and formation of bones and teeth.*	Vitamin D (as cholecalciferol), Magnesium (as magnesium oxide and magnesium aspartate), Phosphorus (from tricalcium phosphate),

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By:	fillest	
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Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 4/29/04

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

Michael P. Devereux Chief Financial Officer